May 16, 2008

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Petition for Rulemaking to Establish Rules Governing Network Management Practices by Broadband Network Operators, Petition for Declaratory Ruling Regarding Internet Management Policies, Broadband Industry Practices, WC Docket No. 07-52

Dear Ms. Dortch:

On May 15, 2008, Douglas Pasko, Co-Chair of the P4P Working Group (P4PWG), and I met separately with the following FCC legal advisors: Scott Deutchman, Chris Moore, John Hunter, and Scott Bergmann, to discuss the industry efforts currently underway to develop business practices and technological processes that could both improve the speed and efficiency of peer-to-peer (P2P) file transfers while also reducing the strain placed on broadband networks by P2P applications. Specifically, we described how the protocols that are being developed within the P4PWG may guide the selection of file sources and network pathways in a manner that maximizes network efficiency and increases the speeds by which customers using P2P systems may redistribute files. Our discussion was consistent with the attached handout.

Respectfully submitted,

Martin C. Lafferty
Chief Executive Officer
Distributed Computing Industry Association

Attachment
CC: Scott Bergmann
Scott Deutchman
John Hunter
Chris Moore

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P4P Working Group

Doug Pasko, Co-Chair, Verizon
Laird Popkin, Co-Chair, Pando

A Distributed Computing Industry Association (DCIA) led initiative

P4P Mission Statement

To work jointly and cooperatively with leading **Internet service providers** (ISPs), **peer-to-peer** (P2P) software distributors, and technology **researchers** to ascertain appropriate and voluntary **best practices** to **accelerate** distribution of content and **optimize** utilization of ISP network resources in order to provide the best possible performance to end-user customers

60+ P4P WG Members

Core Group

AT&T
Bezeq Intl
BitTorrent
Cisco Systems
Comcast
Grid Networks
Joost
LimeWire
Manatt
Oversi
Pando Networks
PeerApp
Solid State
Telefonica Group
Velocix
VeriSign
Verizo
Vuze
Universit
Toront
Univ c
Washing
Yale Univ

Servers

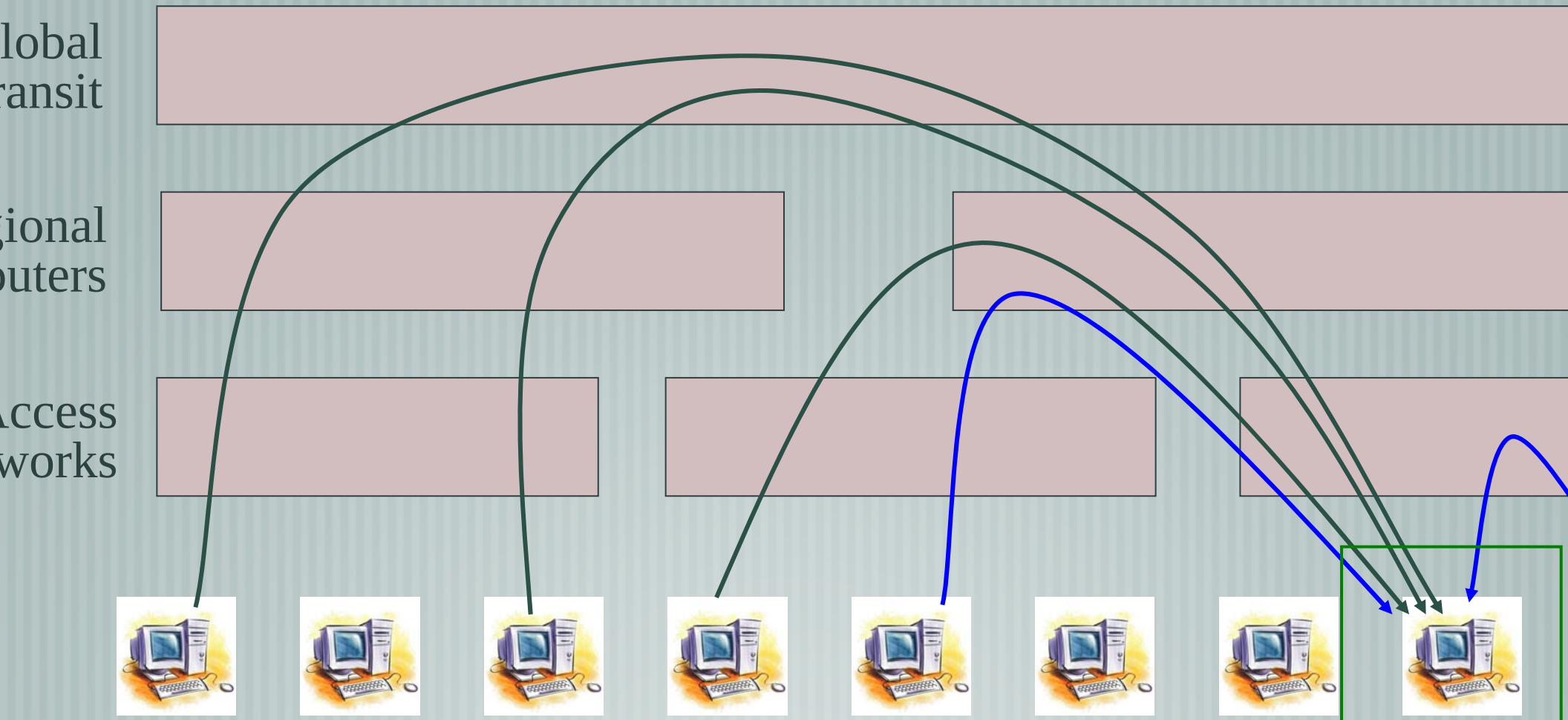
Abacast
AHT Intl
AjauntySlant
Akamai
Alcatel Lucent
CableLabs
Cablevision
Cox Comm
Exa Networks
Lariat Network
Level 3 Communications
Limelight Networks
Microsoft
MPAA
NBC Universal
Nokia
Orange
Princeton University
RawFlow
RSUC/Gwee
SaskTel
Solana Netw
Speakeasy Ne
Stanford Univ
Thomson
Time Warner
Turner Broado

P4P Sub Committees

Caching – Eliot Listman (PeerApp)
Live P2P – Mike King (Abacast)
Telco – Jia Wang (AT&T)
Cable – Rich Woundy (Comcast)
Wireless/Mobile – Tim Cricchio (Cisco)
Satellite – Lowell Feuer (Klikvu)
Hardware – Jeffrey Payne (GridNetworks)
Standards – Enrico Marocco (Telecom Ita
Research – Richard Yang (Yale)
IP Policy / Guidelines – See-Mong Tan

2nd Sources Are Selected Based On Connectivity Speed

(Network Efficiency is not considered)

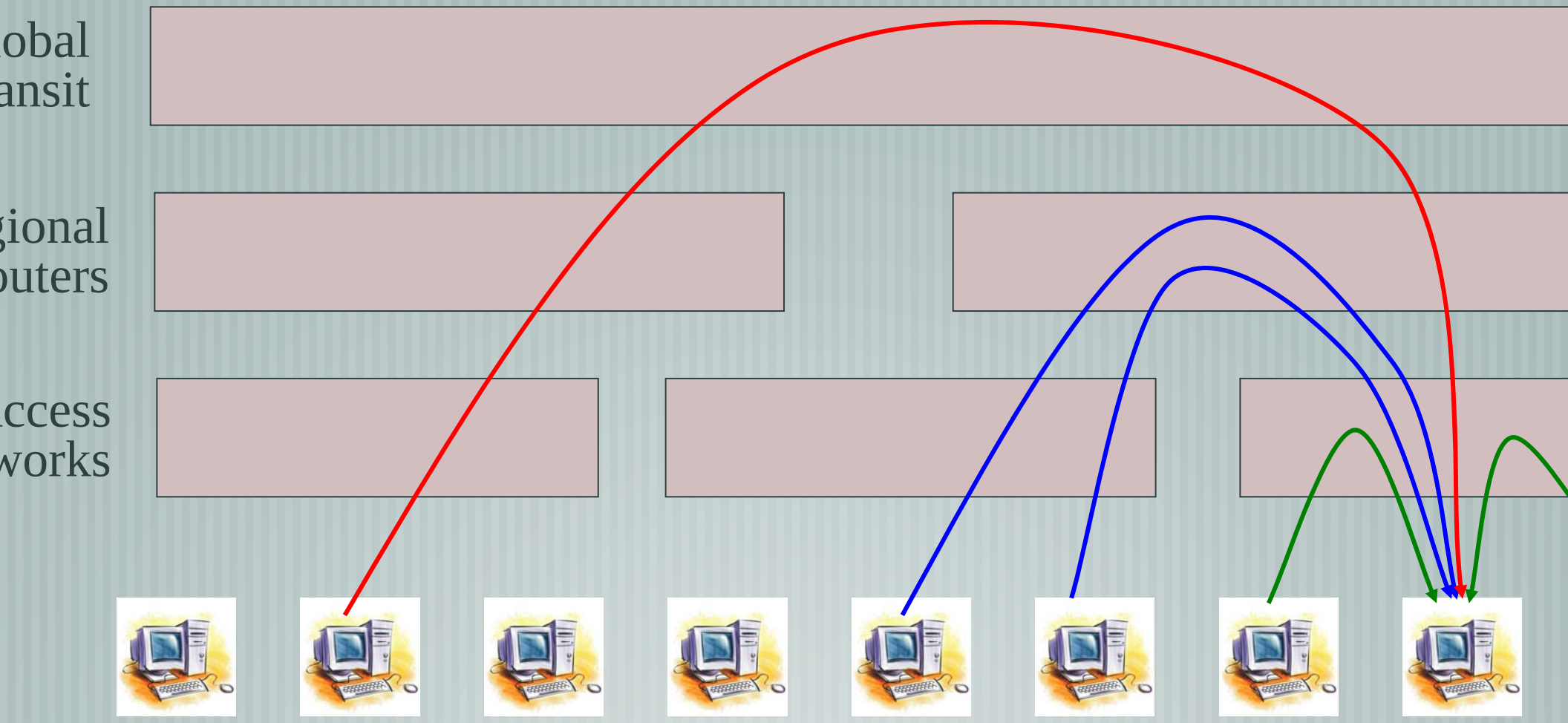


Fastest Connections get priority, even if

Closer connections may be selected, but

Customer Requests a File

P4P Considers The Network



As A Last Resort, Look For Sources Anywhere

If Necessary, Look For Sources Within The Same

Preference Given Sources On The

P4P Test Methodology

- Simulations performed by Yale on data from AT&T, Telefonica, Verizon
- Real World Field Test by Telefonica, Verizon, Yale and Pando.

P4P Test Results

P2P traffic traveled shorter distances which:

- Reduces traffic load on national backbone links
- Reduces traffic load on regional backbone links
- Increases performance of P2P downloads

Some Field Trial Statistics:

- P2P traffic traversed fewer hops, dropping from an average 5.5 to 0.89 (staying within metro considered 0 hops)
- 57.98% of P2P traffic never left the metropolitan area of the requesting user, as compared to 6.27% without P4P optimization
- Average user download speed increase for FiOS customers was 205% over normal P2P (a 2x improvement)

Upcoming Field Tests

- Multi-ISP Field Test in June
- Additional P2P Company Field Tests following shortly